

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

-----X
Jonny Osmar Reyes Obando, *on behalf of himself
and others similarly situated in the proposed FLSA
Collective Action,*

Plaintiff,

- against -

AMD Food Corp., Sunshine Food Corp., and
Asmatullah Tokhie,

Defendants.

Case No.: 1:23-cv-01681-LDH-
SJB

**REQUEST FOR ENTRY OF
DEFAULT**

-----X
Plaintiff Jonny Osmar Reyes Obando (the “Plaintiff”), by and through the undersigned attorneys, Levin-Epstein & Associates, P.C., respectfully requests that the Clerk of the Court enter the default of Defendant Asmatullah Tokhie (the “Defaulting Defendant”) pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, for failure to plead or otherwise defend, as more particularly set forth in the annexed affirmation of Jason Mizrahi, Esq. A Clerk’s Certificate is enclosed herewith.

Dated: New York, New York
April 17, 2023

Respectfully submitted,

By: /s/ Jason Mizrahi
Jason Mizrahi
Levin-Epstein & Associates, P.C.
60 East 42nd Street, Suite 4700
New York, New York 10165
Tel: (212) 792-0048
Email: Jason@levinepstein.com
*Attorneys for the Plaintiff and proposed FLSA
Collection Action Plaintiffs*